

# Exhibit D

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**CALIFORNIANS FOR  
ALTERNATIVES TO TOXICS**

*Appearing pro se*  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO Case No.: 3:24-cv-06632-SI  
TOXICS,

**Plaintiff,**

V.

TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA,

## Defendants.

**STIPULATION TO EXTEND TIME TO  
FILE MOTION FOR FEES RESPOND TO  
COMPLAINT AND COSTS TO DATES IN  
ORDER SETTING INITIAL CASE  
MANAGEMENT CONFERENCE AND  
ADR DEADLINES; [PROPOSED] ORDER  
THEREON**

Honorable Susan Illston

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1 WHEREAS, Plaintiff Californians for Alternatives to Toxics filed a complaint (ECF  
2 No.1) on September 20, 2024, and Defendants Travis Moreda Dairy and Travis Moreda-  
3 responsive pleadingsMoreda's response are due November 25, 2024 (*see* ECF No. 7 (Waiver of  
4 Service of Summons));

5 WHEREAS, the Parties seek additional time to explore settlement opportunities;

6 WHEREAS, Defendants' responsive pleadingresponse to the complaint is due during the  
7 Thanksgiving holiday;

8 WHEREAS, the Parties therefore wish to stipulate to extend, by a period of  
9 approximately thirty days, the time within which Defendants must file their responsive  
10 pleadingresponse from November 25, 2024 to December 27, 2024, and all other dates in the  
11 Court's Order Setting Initial Case Management Conference and ADR Deadlines by  
12 approximately thirty days;

13 WHEREAS, the Parties also wish to stipulate to extend, by a period of thirty days, the  
14 time within which Plaintiff may file an opposition to Defendants' responsive pleadingresponse,  
15 should such an opposition be appropriate and necessary;

16 WHEREAS, pursuant to Local Rule 6-2, this stipulation is accompanied by a declaration  
17 setting forth with particularity, the reasons for the requested enlargement of time (to allow  
18 further settlement discussion and to account for intervening holidays), all previous time  
19 modifications in the case (none), and the effect the requested time modification would have on  
20 the schedule for the case (none) (See Declaration of William N. Carlon in Support of Stipulation  
21 to Extend Time, filed herewith);

22 THEREFORE, it is hereby stipulated and agreed, by and among the Parties, through their  
23 undersigned attorneys of record, subject to the approval of the Court, that there is good cause for  
24 the following:

1. There is good cause to extend the time within which Defendants shall have an  
 2 extension to file its responsive pleading pursuant to Rule 12 their response to the complaint, from  
 3 November 25, 2024 to December 27, 2024;

4. There is good cause to extend the time within which Plaintiff shall have to file an  
 5 opposition to Defendants' responsive pleading response, if applicable, by a period February 3,  
 6 2025;

7. The deadline for the Parties to meet and confer pursuant to Federal Rule of thirty  
 8 days Civil Procedure 26(f) will be extended from December 23, 2024 to January 22, 2025;

9. The deadline for the Parties to make initial disclosures will be extended from  
 10 January 3, 2025 to February 3, 2025;

11. The deadline for the Parties to file their Joint Case Management Statement will be  
 12 extended from January 3, 2025 to February 3, 2025;

13. 2.6. The date for the Court to hold its initial Case Management Conference will be  
 14 extended from January 10, 2025 to February 14, 2025 or another date thereafter at the Court's  
 15 convenience.

16 IT IS SO STIPULATED.

17 Dated: November 19, 2024 LAW OFFICE OF WILLIAM CARLON

18 By: /s/ William N. Carlon  
 19 William N. Carlon  
 20 Attorney for Plaintiff  
 21 Californians for Alternatives to Toxics

22 Dated: November 19, 2024 TRAVIS MOREDA DAIRY

23 By: /s/Travis Moreda  
 24 Travis Moreda, d.b.a. Travis Moreda Dairy  
 25 *Appearing Pro Se*

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## ORDER

**ORDER ON STIPULATION TO EXTEND TIME TO FILE RESPONSIVE  
PLEADING RESPOND TO COMPLAINT AND OPPOSITION THERETO DATES IN  
ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR  
DEADLINES**

Good cause appearing, and PURSUANT TO STIPULATION,:

1. Defendants shall have an extension to file their response to the complaint, from November 25, 2024 to December 27, 2024;
2. Plaintiff shall file an opposition to Defendants' response, if applicable, by February 3, 2025;
3. The deadline for the Parties to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) will be extended from December 23, 2024 to January 22, 2025;
4. The deadline for the Parties to make initial disclosures will be extended from January 3, 2025 to February 3, 2025;
5. The deadline for the Parties to file their Joint Case Management Statement will be extended from January 3, 2025 to February 3, 2025;
6. The date for the Court to hold its initial Case Management Conference will be extended from January 10, 2025 to \_\_\_\_\_.

**IT IS SO ORDERED—.**

Dated:

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**Susan Illston  
United States District Judge**

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STIPULATION EXTENDING TIME

Case No. 3:24-cv-06632-SI

## **ATTESTATION FOR E-FILING**

I hereby attest pursuant to Civil L.R. 5-1(i)(3) that I have obtained concurrence in the filing of this document from the other Signatory prior to filing.

DATED: November 19, 2024

By: /s/ William N. Carlon